

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DEAN SKELOS and ADAM SKELOS,

Defendants.

No. 15 Cr. 317 (KMW)

**REPLY DECLARATION OF
ALEXANDRA A.E. SHAPIRO IN
SUPPORT OF MOTION FOR
RULE 6(e) HEARING**

ALEXANDRA A.E. SHAPIRO, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a partner at Shapiro Arato LLP, attorneys for Defendant Dean Skelos. I am submitting this reply declaration in further support of Defendants' Motion for a Rule 6(e) Hearing, dated March 1, 2018.

2. Attached hereto as Exhibit 1 is a true and correct copy of a letter from Preet Bharara to G. Robert Gage, dated October 1, 2015.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Memorandum of Law in Support of William T. Walters' Motion to Dismiss, dated January 13, 2017.¹

4. Attached hereto as Exhibit 3 is a true and correct copy of the Government's Opposition to William T. Walters' Motion to Dismiss, dated January 30, 2017.

5. Attached hereto as Exhibit 4 is a true and correct copy of a letter from Preet Bharara to the Hon. P. Kevin Castel, dated January 4, 2017 (the "USAO *Walters* Letter").

6. Attached hereto as Exhibit 5 is a true and correct copy of the first exhibit to the USAO *Walters* Letter.

¹ The pleadings from *United States v. Walters* attached to this declaration reflect certain redactions that appear on the publicly filed versions of those pleadings.

7. Attached hereto as Exhibit 6 is a true and correct copy of the second exhibit to the USAO *Walters* Letter.

8. Attached hereto as Exhibit 7 is a true and correct copy of the fourth exhibit to the USAO *Walters* Letter.

9. Attached hereto as Exhibit 8 is a true and correct copy of the fifth exhibit to the USAO *Walters* Letter.

10. Attached hereto as Exhibit 9 is a true and correct copy of the sixth exhibit to the USAO *Walters* Letter.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 12, 2018
New York, New York

/s/ Alexandra A.E. Shapiro
ALEXANDRA A.E. SHAPIRO